McGuireWoods LLP 201 North Tryon Street Suite 3000 Charlotte, NC 28202-2146 Phone: 704.343.2000 Fax: 704.343.2300 www.mcguirewoods.com

Jasmine K. Gardner



jgardner@mcguirewoods.cor

February 14, 2019

VIA ELECTRONIC FILING

Ms. Jocelyn G. Boyd Chief Clerk and Administrator The Public Service Commission of South Carolina Synergy Business Park 101 Executive Center Drive Columbia, South Carolina 29210

Re: GCRM-149, Docket No. 2006-401-G

Dear Ms. Boyd:

On behalf of Piedmont Natural Gas Company, Inc. ("Piedmont"), I have enclosed various schedules constituting Piedmont's GCRM-149.

The rate changes reflected in this filing, as shown on the attached schedules, are necessary to update Piedmont's rates to reflect changes in Piedmont's wholesale costs of gas. Wholesale futures contract prices for natural gas deliveries, as reflected on the New York Mercantile Exchange, are currently at levels below the \$3.00 per dekatherm commodity cost of gas reflected in Piedmont's rates.

Based on the differential between Piedmont's existing benchmark cost of gas and the futures wholesale price, as well as the current balance in its deferred gas cost account, Piedmont is at risk of over-collecting its wholesale gas costs if the benchmark cost of gas reflected in its rates is not decreased to \$2.75 per dekatherm as proposed herein. The relief requested herein will mitigate such over-collection and will also ensure that the wholesale gas costs reflected in Piedmont's rates are reasonably consistent with the prevailing market price for natural gas, thereby avoiding the creation of artificial market signals/incentives to parties who utilize this commodity for fuel or process purposes. The rate changes proposed herein are a decrease of \$0.02544/therm for sales rate schedules (201, 202, 242, 252, 203 and 204) and a decrease of \$0.00044/therm for transportation rate schedules (213 and 214).

Piedmont hereby requests approval of this GCRM filing in time to implement these rate changes effective with the first billing cycle in March, 2019.

Ms. Jocelyn G. Boyd February 14, 2019 Page 2

If you have any questions regarding this matter, you may reach me at the number shown above.

Sincerely,

/s/ Jasmine K. Gardner

Jasmine K. Gardner

Enclosures

cc: Bruce Barkley

Pia Powers Brian Heslin Jim Jeffries

Office of Regulatory Staff (via email and overnight delivery)

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF MECKLENBURG

Kally A. Couzens, being duly sworn, deposes and says that she is Rates & Regulatory Strategy Manager – Regulatory Affairs of Piedmont Natural Gas Company, Inc., that as such, she has read the foregoing and knows the contents thereof; and she believes that the facts set forth therein are true and correct.

Kally A. Conzens

Mecklenburg County, North Carolina Signed and sworn to before me this day by Kally A Couzens.

Date: 2/14/19

Shannon L. Wall, Notary Public

(Official Seal)

My Commission Expires: (

SHANNON L. WALL Notary Public, North Carolina Mecklenburg County My Commission Expires June 28, 2022

Schedule A

Piedmont Natural Gas Company, Inc.
State of South Carolina
Proposed Benchmark Commodity Rate Change - GCRM 149, Docket No. 2006-401-G

		(a)	(b) GCRM-149	(c)
		February 2019 Current	COG Commodity Rate	March 2019 Proposed
Rate Schedules:		Billing Rates ¹	<u>Change</u>	Billing Rates
201	Residential Service			
	Monthly Charge-winter	10.00	-	10.00
	Monthly Charge-summer	8.00	-	8.00
	Winter (NovMar.) per therm	0.80572	(0.02544)	0.78028
	Summer (AprOct.) per therm	0.76231	(0.02544)	0.73687
202	Small General Service			
	Monthly Charge	22.00	(0.00544)	22.00
	Winter (NovMar.) per therm	0.72125	(0.02544)	0.69581
252	Summer (AprOct.) per therm Medium General Service	0.71033	(0.02544)	0.68489
252	Monthly Charge	75.00		75.00
	Winter (NovMar.) per therm	0.69000	(0.02544)	0.66456
	Summer (AprOct.) per therm	0.67908	(0.02544)	0.65364
242	Natural Gas Vehicle Fuel Service		(***=****)	
	Winter (NovMar.) per therm	0.59714	(0.02544)	0.57170
	Summer (AprOct.) per therm	0.59714	(0.02544)	0.57170
	Winter (NovMar.) per GGE ²	0.75240		0.72034
	Summer (AprOct.) per GGE ²	0.75240		0.72034
243				
	Monthly Charge			
	Winter (NovMar.)			
	Summer (AprOct.)			
203	. 3			
	Monthly Charge	250.00	-	250.00
	Billing Demand per therm	1.10000	-	1.10000
	Winter (NovMar.) per therm	0.50040	(0.00544)	0.54404
	First 15,000	0.53648	(0.02544)	0.51104
	Next 15,000	0.47077 0.42274	(0.02544)	0.44533
	Next 75,000 Next 165,000	0.42274	(0.02544) (0.02544)	0.39730 0.35106
	Next 330,000	0.32936	(0.02544)	0.30392
	Over 600,000	0.30579	(0.02544)	0.28035
	Summer (AprOct.) per therm		(***=****)	
	First 15,000	0.46220	(0.02544)	0.43676
	Next 15,000	0.41507	(0.02544)	0.38963
	Next 75,000	0.38560	(0.02544)	0.36016
	Next 165,000	0.35793	(0.02544)	0.33249
	Next 330,000	0.32936	(0.02544)	0.30392
	Over 600,000	0.30579	(0.02544)	0.28035
204	•	050.00		050.00
	Monthly Charge Winter (NovMar.) per therm	250.00	-	250.00
	First 15,000	0.56148	(0.02544)	0.53604
	Next 15,000	0.49577	(0.02544)	0.47033
	Next 75,000	0.44864	(0.02544)	0.42320
	Next 165,000	0.40300	(0.02544)	0.37756
	Next 330,000	0.35336	(0.02544)	0.32792
	Over 600,000	0.33079	(0.02544)	0.30535
	Summer (AprOct.) per therm		. ,	
	First 15,000	0.48720	(0.02544)	0.46176
	Next 15,000	0.44007	(0.02544)	0.41463
	Next 75,000	0.41150	(0.02544)	0.38606
	Next 165,000	0.38443	(0.02544)	0.35899
	Next 330,000	0.35336	(0.02544)	0.32792
	Over 600,000	0.33079	(0.02544)	0.30535
205	Outdoor Gas Light Service Per Fixture/Mo.	15.00		15.00
	FEI FIXIUIE/IVIO.	15.00	-	15.00

Piedmont Natural Gas Company, Inc.
State of South Carolina
Proposed Benchmark Commodity Rate Change - GCRM 149, Docket No. 2006-401-G

		(a) (b) GCRM-149		(c)	
		February 2019 Current	COG Commodity Rate	March 2019 Proposed	
Rate Schedules:		Billing Rates ¹	<u>Change</u>	Billing Rates	
213	Large General Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Standby Demand per therm	0.45000	-	0.45000	
	Billing Demand per therm	0.80000	-	0.80000	
	Winter (NovMar.) per therm				
	First 15,000	0.21048	(0.00044)	0.21004	
	Next 15,000	0.14877	(0.00044)	0.14833	
	Next 75,000	0.10804	(0.00044)	0.10760	
	Next 165,000	0.06650	(0.00044)	0.06606	
	Next 330,000	0.02476	(0.00044)	0.02432	
	Over 600,000	0.00579	(0.00044)	0.00535	
	Summer (AprOct.) per therm				
	First 15,000	0.13620	(0.00044)	0.13576	
	Next 15,000	0.09307	(0.00044)	0.09263	
	Next 75,000	0.07090	(0.00044)	0.07046	
	Next 165,000	0.04793	(0.00044)	0.04749	
	Next 330,000	0.02476	(0.00044)	0.02432	
	Over 600,000	0.00579	(0.00044)	0.00535	
214	Interruptible Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Winter (NovMar.) per therm				
	First 15,000	0.22648	(0.00044)	0.22604	
	Next 15,000	0.16577	(0.00044)	0.16533	
	Next 75,000	0.11364	(0.00044)	0.11320	
	Next 165,000	0.07250	(0.00044)	0.07206	
	Next 330,000	0.03136	(0.00044)	0.03092	
	Over 600,000	0.00579	(0.00044)	0.00535	
	Summer (AprOct.) per therm				
	First 15,000	0.15220	(0.00044)	0.15176	
	Next 15,000	0.11007	(0.00044)	0.10963	
	Next 75,000	0.07650	(0.00044)	0.07606	
	Next 165,000	0.05393	(0.00044)	0.05349	
	Next 330,000	0.03136	(0.00044)	0.03092	
	Over 600,000	0.00579	(0.00044)	0.00535	

^{1/} The rates in Column (a) are the same as those shown in the Company's Etariff filing revision #E2019-34 (version 32) approved on 2/8/19.

^{2/} The rates convert 1.26 therms to 1 GGE.

Schedule B

Piedmont Natural Gas Company, Inc. State of South Carolina Commodity Cost of Gas Calculation Docket No. 2006-401-G GCRM - 149

	Annualized Throughput (DT) per Docket 2018-7-G Settlement Approved on 10/3/2018, Order No. 2018-679	Proposed Commodity			<u>Total</u>
Sales	15,337,035	\$	2.75	\$	42,176,846
Transportation	5,610,407				
Total Throughput	20,947,442				
LAUF %	1.77%				
Company Use & Lost And Unacct For	370,770	\$	2.75	\$	1,019,618
Total Throughput					20,947,442
Calculated Rate - LAUF					0.0487
Proposed Sales Commodity Rate per DT Proposed Sales Commodity Rate per Therm Current Sales Commodity Rate per Therm Adjustment to Sales Commodity Rate per Therm					2.79870 0.27987 0.30531 (0.02544)
Proposed Transportation Commodity Rate per DT Proposed Transportation Commodity Rate per Therm Current Transportation Commodity Rate per Therm Adjustment to Transportation Commodity Rate per Therm				\$ \$ \$	0.04870 0.00487 0.00531 (0.00044)
Current Benchmark Proposed Benchmark				\$ \$	3.00 2.75

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached document is being served this date via email and FedEx Overnight upon:

Jeffrey M. Nelson
Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, South Carolina 29201
jnelson@regstaff.sc.gov

And that a copy of the attached document is being served this date via email or U.S. Mail upon:

Bruce Barkley
Vice President
Regulatory and Community Relations
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, North Carolina 28233
bruce.barkley@piedmontng.com

and

Pia Powers

Director – Gas Rates & Regulatory Affairs
Piedmont Natural Gas Company, Inc.
P.O. Box 33068

Charlotte, North Carolina 28233
pia.powers@piedmontng.com

This the 14th day of February, 2019.

/s/ Richard K. Goley Richard K. Goley